

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative  
of the Estate of Aldo Vera, Sr.,

Plaintiff,

v.

THE REPUBLIC OF CUBA,

Defendant.

Case No. 12-CV-01596  
(AKH)

ALDO VERA, JR., as Personal Representative  
of the Estate of Aldo Vera, Sr.; and

JEANETTE FULLER HAUSLER, and WILLIAM FULLER as  
court-appointed co-representatives of the ESTATE OF ROBERT  
OTIS FULLER, deceased, on behalf of all beneficiaries of the  
Estate and the ESTATE OF ROBERT OTIS FULLER; and

ALFREDO VILLOLDO, individually, and  
GUSTAVO E. VILLOLDO, individually and as Administrator,  
Executor, and Personal Representative of the ESTATE OF  
GUSTAVO VILLOLDO ARGILAGOS,

Petitioners,

v.

BANCO BILBAO VIZCAYA ARGENTARIA (S.A.); BANK OF  
AMERICA N.A.; BANK OF NEW YORK MELLON;  
BARCLAY'S BANK PLC; CITIBANK N.A.; CREDIT SUISSE  
AG, NEW YORK BRANCH; DEUTSCHE BANK TRUST  
COMPANY AMERICAS; HSBC BANK (HSBC BANK USA,  
N.A.); INTESA SANPAOLO S.P.A.; JP MORGAN CHASE  
BANK, N.A.; RBS CITIZENS, N.A.; ROYAL BANK OF  
CANADA; SOCIETE GENERALE; UBS AG; WELLS FARGO  
BANK, NA; BROWN BROTHERS HARRIMAN & CO.;  
MERCANTIL COMMERCEBANK, N.A.; STANDARD  
CHARTERED BANK; AND BANCO SANTANDER, S.A.,

Respondents/Garnishees.

**ANSWER OF THE  
HAUSLER  
PETITIONERS TO  
JPMORGAN CHASE  
BANK N.A.'s THIRD-  
PARTY PETITION  
ALLEGING CLAIMS  
IN THE NATURE OF  
INTERPLEADER**

JPMORGAN CHASE BANK, N.A.,

Garnishee-Respondent and Third-Party Petitioner,

v.

AT&T INC. and CUBAN-AMERICAN TELEPHONE &  
TELEGRAPH COMPANY;

EMPRESA DE TELECOMUNICACIONES  
INTERNACIONALES DE CUBA (“EMTELCUBA”);  
EMPRESA DE RADIOCOMUNICACIÓN Y DIFUSION DE  
CUBA (“RADIOCUBA”); EMPRESA DE  
TELECOMUNICACIONES DE CUBA SA (“ETECSA”); and the  
REPUBLIC OF CUBA

and

ALDO VERA, JR., as personal representative of the Estate of  
Aldo Vera, Sr., JEANETTE FULLER HAUSLER, and WILLIAM  
FULLER as court-appointed co-representatives of the ESTATE  
OF ROBERT OTIS FULLER, and ALFREDO VILLOLDO,  
individually and as Administrator, Executor and Personal  
representative of the ESTATE OF GUSTAVO VILLOLDO  
ARGILAGOS,

Adverse Claimants-Respondents

Petitioner Jeannette Fuller Hausler, and William Fuller as court-appointed co-representatives of the Estate of Robert Otis Fuller, deceased, on behalf of all beneficiaries of the Estate and the Estate of Robert Otis Fuller (collectively “Hausler Petitioners”), by their undersigned attorneys, for their Answer to the Third-Party Petition Alleging Claims in the Nature of Interpleader (ECF No. 559) (the “Interpleader Petition”) filed by JPMorgan Chase Bank, N.A. (“JPMorgan”) state that they claim no interest in the accounts which are the subject of the Interpleader Petition and, therefore, neither admit nor deny the allegations contained in paragraphs 1 – 45 of the Interpleader Petition. To the extent a response is required to each

specific factual allegation, Hausler adopts and incorporates as if fully set forth herein the responses of the Villoldo and Vera Claimants in their separate filed answer to the Interpleader Petition.

COLSON, HICKS, EIDSON

GREENBERG TRAURIG, LLP

/s/ Roberto Martinez

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\* *pro hac vice* admission pending (ECF No. 293)

*Attorneys for Petitioners Jeanette Fuller Hausler, and William Fuller as court-appointed co-representatives of the Estate of Robert Otis Fuller, deceased, on behalf of all beneficiaries of the Estate and the Estate Of Robert Otis Fuller*

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*Attorneys for Petitioners Jeanette Fuller Hausler, and William Fuller as court-appointed co-representatives of the Estate of Robert Otis Fuller, deceased, on behalf of all beneficiaries of the Estate and the Estate Of Robert Otis Fuller*